

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

IN RE:

Amanda June Kolle,
Debtor.

)
)
) Case No. 17-41701-CAN
)
)

IN RE:

DeAnn Michelle Gould,
Debtor.

)
)
) Case No. 17-42125-DRD
)
)

IN RE:

Justin Mantez Mackey,
Debtor.

)
)
) Case No. 17-42465-BTF
)
)

IN RE:

Melissa Maxine Long,
Debtor.

)
)
) Case No. 17-43023-BTF
)
)

IN RE:

Lateisha Jene Robinson,
Debtor.

)
)
) Case No. 17-43094-CAN
)
)

IN RE:

Ernestine Richetta Franklin,
Debtor.

)
)
) Case No. 17-43313-BTF
)
)

IN RE:

Leona Tenelle Harvey,
Debtor.

)
)
) Case No. 18-40087-CAN
)
)

IN RE:)	
)	
Nechol Mutesa Washington,)	Case No. 18-40264-CAN
)	
Debtor.)	
)	
IN RE:)	
)	
Angel Marie Demeturis Anderson,)	Case No. 18-40723-DRD
)	
Debtor.)	
)	
IN RE:)	
)	
Kenneth Darwin Cook,)	Case No. 18-41222-DRD
)	
Debtor.)	
)	

MOTION FOR EXTENSION OF TIME TO FILE A NOTICE OF APPEAL

COMES NOW Respondent, Jason C. Amerine of Castle Law Office of Kansas City, P.C. (“**Respondent**” or “**Mr. Amerine**”), and hereby files, pursuant to Fed. R. Bankr. P. 8002(d)(1) & 9006(b)(1), his *Motion for Extension of Time to File a Notice of Appeal* (“**Motion**”). In support of this *Motion*, Mr. Amerine states:

1. As the Court is aware, its *Memorandum Opinion and Order Finding Cause to Refer Attorney for Professional Discipline* (“**Memorandum Opinion**”) was entered on December 10, 2021, regarding the *Amended Order to Show Cause to Jason C. Amerine of Castle Law of Kansas City, P.C.* (“**AOSC**”).

2. The undersigned has had a very poor work schedule over the past two weeks. By way of example,

- a. The undersigned had an in-person hearing in eastern Illinois on December 13, 2021, which event required four hours of round-trip driving for the relatively short hearing;
- b. I had to defend an expert deposition on December 14, 2021;
- c. I attended an all-day mediation that extended past 5:30 p.m. on December 17, 2021;
- d. I was the lead counsel for an evidentiary hearing in St. Louis County Circuit Court that lasted to 2:45 p.m. on December 21, 2021; and
- e. I was the lead (and sole) counsel for a bench trial today, December 23, 2021, which did not conclude until 2:30 p.m.

3. Due to that work schedule, and other matters that included preparation work for all of those various activities, the undersigned has not had sufficient time to thoroughly review the *Memorandum Opinion* and consult with Mr. Amerine about any possible appeal options.

4. This request is not made because a decision about a possible appeal has been made. The undersigned simply has not had any time to review the *Memorandum Opinion* in-depth and consult with Mr. Amerine. It very well may be that no appeal decision will be made by my client. However, the undersigned, out of caution, seeks an extension of time to file the notice of appeal rather than proceed with a rushed decision.

5. For these reasons, a request is made on behalf of Mr. Amerine for a fourteen (14) day extension of the time to file the notice of appeal.

6. It is counsel's understanding that the current notice of appeal is due on December 27, 2021. That conclusion is based on the fourteen-day deadline in Rule 8002, which makes the initial deadline December 24, 2021. However, it is believed the federal courts are closed on December 24, 2021, in observance of Christmas Day, which falls on a Saturday. *See* 5 U.S.C. § 6103(b)(1). As such, pursuant to Rule 9006(a)(1)(C), the deadline would be December 27, 2021. And, if a fourteen-day extension for the notice of appeal is granted, then that would make the new deadline January 10, 2022.

7. This request is not made for purposes of undue delay or prejudice to the Court or anyone else.

WHEREFORE, Respondent prays the Court Grants/Sustains this *Motion* and ORDERS an extension of the time to file a notice of appeal, up to and including January 10, 2022, and for such other relief as the Court deems proper and just.

Respectfully submitted,

BROWN & JAMES, P.C.

By: /s/ Matthew G. Koehler
Matthew G. Koehler, #48760
800 Market Street, Suite 1100
St. Louis, Missouri 63101-2501
Phone: (314) 421-3400
Fax: (314) 421-3128
mkoehler@bjpc.com

*Attorneys for Respondent Jason C.
Amerine of Castle Law Office of Kansas
City, P.C.*

CERTIFICATE OF SERVICE

A copy of the foregoing document was electronically filed with the United States Bankruptcy Court, Western District of Missouri, through the Court's electronic filing system and electronically served on all counsel of record, on this 23rd day of December, 2021.

/s/ Matthew G. Koehler
